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*Attorney for Plaintiff Robert Jackson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROBERT JACKSON

Plaintiff,

v.

STATE OF NEVADA, et al.,

Defendant(s).

Case No.: 2:16-CV-00995-APG-NJK

**STATUS REPORT AND FOURTH  
STIPULATION TO EXTEND  
DEADLINES IN STATUS REPORT  
(ECF NO. 135)**

Plaintiff Robert Jackson ("Mr. Jackson"), by and through his undersigned counsel, and Defendants State of Nevada, et al., ("Defendants"), by and through their undersigned counsel, hereby stipulate and agree to extend the time to confer in an attempt to resolve the outstanding issues of fees and costs, as set forth in the Status Report filed February 27, 2023 (ECF No. 135), the Stipulation to Extend Deadlines in Status Report (ECF No. 138), the Second Stipulation to Extend Deadlines in Status Report (ECF No. 141), and the Third Stipulation to Extend Deadlines in Status Report (ECF No. 143).

The parties have been in communication related to the ongoing issue regarding the attorneys' fee and cost award. The parties have also been discussing issues related to the Stipulation and Order Regarding Injunction, entered July 28, 2020 (ECF No. 122), in particular Southern Desert Correctional Center's implementation of a diet for Plaintiff that was in compliance with the injunction. Additionally, the Nevada Department of Corrections recently announced that it would be making changes to its menus, including the menu for Plaintiff. Accordingly, the parties ask that the Court set an in-person status check for 6 months from the

1 date of this Status Report, for the parties to provide the Court with an update regarding 1) the  
 2 attorneys' fee and cost award and 2) NDOC's updated menu and the implementation of the  
 3 injunction. Alternatively, on or before March 11, 2024, the parties shall file a proposed form of  
 4 judgment, a status report regarding the status of the settlement and injunction, or for a Plaintiff to  
 5 file a motion for attorneys' fees or costs.

6 This is the fourth stipulation for an extension of time to confer regarding the outstanding  
 7 issues of fees and costs. The Parties represent that this stipulation is sought in good faith, is not  
 8 interposed for delay, and is not filed for an improper purpose. Accordingly, the deadline set forth  
 9 in the Status Report shall be extended as follows:

10 Deadline for the parties to file a proposed form of final judgment, status report, or for  
 11 Plaintiff to file a motion for attorneys' fees and costs: March 11, 2024.

12 DATED this 8th day of September 2023.

DATED this 8th day of September 2023.

13 By: /s/ Emily A. Buchwald  
 14 Emily A. Buchwald, Esq., Bar No. 13442  
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By: /s/ D. Randall Gilmer  
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16 *Attorneys for Plaintiff Robert Jackson*

*Attorney for Defendants Jennifer Nash and  
 Brian Williams*

20 **IT IS SO ORDERED.**

21   
 22 UNITED STATES DISTRICT JUDGE

23 DATED September 19, 2023

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